

Exhibit A

From: [Sullivan, John](#)
To: cinque845@aol.com
Subject: RE: Glasswall adv. Westchester Fire
Date: Monday, December 23, 2019 10:22:00 AM

Hi Jim, our responses are in red below. Regards, John

**John J. Sullivan**
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From: cinque845@aol.com <cinque845@aol.com>
Sent: Monday, December 16, 2019 4:01 PM
To: Sullivan, John <JSullivan@cozen.com>
Subject: Glasswall adv. Westchester Fire

****EXTERNAL SENDER****

John:

I thumbed through your document production and have the following questions:

1. Please let me know if there are any retainer agreements between Westchester and your firm. If there are any, please provide copies. *While I will have the file searched for this, please let me know the relevance. By that I mean, you already have the time records that lay out the work that we did for Westchester, the (low) rates that we charged, the overall fees, any challenges to fees and the outcome.*
2. Are the documents you produced the actual bills which were sent to Westchester? If not, please provide copies. *Invoices are presented to Westchester through an electronic billing system from which we provided you the printout. In other words, there is no written and mailed invoice. It is submitted electronically. The printouts that you received also include any challenges that Westchester made to hours, which Westchester does on a regular basis with all its outside attorneys, and the resolution of those challenges. In short, the produced documents show the invoices *plus* that challenge process.*
3. I did not see any documents relating to payment of the legal fees, such as canceled checks or wire transfer documents. Please provide copies. *I'll confirm whether they have been provided and, if not, I will provide.*
4. There were a number of redacted entries, and I believe that Glasswall is entitled to production of the entire documents (without redactions). *We have looked into this. Seeking fees under a contract, or in any other setting, does not waive privilege, and we are entitled to redact privileged material. You have the information necessary, however, to identify the work done. As we understand it, this is how these litigations proceed. If you have any controlling law otherwise, please provide it and we will consider.*
5. Is it possible to send the document production in PDF format? *Of course.*

I would like to depose a representative of Westchester in mid to late February, so please provide several date within that period which are good for you and the witness. *I will get dates.*

Jim

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